

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11193-NG

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SHAWN DRUMGOLD, )  
Plaintiff )  
 )  
v. )  
 )  
TIMOTHY CALLAHAN, et. al., )  
Defendants )  

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**DEFENDANTS CITY OF BOSTON AND FRANCIS M. ROACHE'S**  
**MANDATORY DISCLOSURE PURSUANT TO FED.R.CIV.P. 26(a)**  
**AND LOCAL RULE 26.2**

**(a)(1)(A) Individuals With Discoverable Information**

Francis M. Roache  
Boston Police Department

John Dailey  
Boston Police Department

Paul Evans  
Boston Police Department

Edward McNelley  
Boston Police Department

Joseph Dunford  
Boston Police Department

Joseph Saia  
Boston Police Department

Daniel Coleman  
Boston Police Department

Robert Dunford  
Boston Police Department

Ann Marie Doherty  
Boston Police Department

James Jordan  
Boston Police Department

Jennifer W. Maconochie  
Boston Police Department

Daniel Keeler  
Boston Police Department

William Mahoney  
Boston Police Department

Peter O'Malley  
Boston Police Department

William Dunn  
Boston Police Department

Robert Francis  
Boston Police Department

Robert Ahearn  
Boston Police Department

William McCarthy  
Boston Police Department

Lorraine Henshaw  
Boston Police Department

Trent Holland  
Boston Police Department

Wilbur Brittle  
Boston Police Department

Thomas Miller  
Boston Police Department

Robin DeMarco  
Boston Police Department

Marie Donohue  
Boston Police Department

Miller Thomas  
Boston Police Department

Michael D. Stratton  
Boston Police Department

Justina Mitchell  
Boston Police Department

James Claiborne  
Boston Police Department

Paul Joyce  
Boston Police Department

Pervis Ryan  
Boston Police Department

William Hussey  
Boston Police Department

Herbert Spellman  
Boston Police Department

The defendants hereby incorporate by reference the list of witnesses produced by the other defendants, Paul Murphy, Timothy Callahan and Richard Walsh, in their respective mandatory disclosures.

The defendants reserve their rights to amend and supplement this list throughout the discovery period in this case.

**(a)(1)(B)      Documentation**

- A. Documents regarding the investigation, initial trial, habeas corpus proceedings and motion for new trial of Shawn Drumgold in the custody, possession and/or control of the City of Boston;
- B. Documents regarding the investigation and trials of Donnell Johnson in the custody, possession and/or control of the City of Boston;
- C. Documents regarding the investigation of William Bennett relative to the homicide of Carol Stuart in the custody, possession and/or control of the City of Boston;
- D. Documents regarding the investigation and trial of Christopher Harding in the custody, possession and/or control of the City of Boston;

- E. Documents regarding the investigation and trial Marvin Mitchell in the custody, possession and/or control of the City of Boston.

The defendants reserve their rights to amend and supplement this list throughout the discovery period in this case.

**(a)(1)(C)      Computation of Damages**

The defendants do not have any insurance which would extend coverage to the allegations contained in the plaintiff's complaint.

**(a)(1)(D)      Insurance Coverage**

Not applicable to defendants.

The defendants reserve their rights to amend and supplement this list throughout the discovery period in this case.

Respectfully submitted,  
By Defendants City of Boston and  
Francis M. Roache  
Through their attorneys,

/s/ John P. Roache  
John P. Roache (BBO# 421680)  
Patrick J. Donnelly (BBO# 651113)  
Hogan, Roache & Malone  
66 Long Wharf  
Boston, Massachusetts 02110  
Tel.: (617) 367-0330

Date: December 5, 2005

**CERTIFICATE OF SERVICE**

I, John P. Roache, hereby certify that on this 5<sup>th</sup> day of December, 2005, I have served a copy of the foregoing DEFENDANTS CITY OF BOSTON AND FRANCIS M. ROACHE'S MANDATORY DISCLOSURE PURSUANT TO FED.R.CIV.P. 26(a) AND LOCAL RULE 26.2, where unable to do so electronically, via U.S. first class mail, postage prepaid, as follows:

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//s// John P. Roache  
John P. Roache (BBO# 421680)